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Attorneys for Sayers Construction, LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA, For the
Use of Benefit of SOURCE HELICOPTERS,
DIVISION OF ROGERS HELICOPTERS,
INC., a California corporation,

Plaintiff,

vs.

SAYERS CONSTRUCTION, LLC, a Texas
limited liability company, PHILADELPHIA
INDEMNITY INSURANCE COMPANY, a
PENNSYLVANIA corporation, and DOES I-V
and ROE CORPORATIONS I-V,

Defendants.

Case No.: 2:19-cv-1602-JCM-EJY

**JOINT STIPULATION TO EXTEND
TIME FOR SAYERS CONSTRUCTION,
LLC TO FILE RESPONSE TO USE-
PLAINTIFF'S MOTION TO DISMISS
SAYERS CONSTRUCTION, LLC'S
COUNTERCLAIMS**

1 Pursuant to LR IA 6-1, Division of Rogers Helicopters, Inc. (“Rogers”), Use-Plaintiff in this
2 action, and Defendant Sayers Construction, LLC (“Sayers”) (collectively, the “Stipulating Parties”)
3 hereby stipulate as follows:

- 4 1. Sayers’ time to file its Response to Rogers’ Motion to Dismiss Sayers’ Counterclaims (Dkt.
5 No. 30) is hereby extended fifteen (15) days. Any response brief submitted in response to
6 Rogers’ Motion to Dismiss Sayers’ Counterclaims shall be filed on or before Tuesday,
7 January 21, 2020.
- 8 2. Sayers’ time to file a Response Brief in Opposition to Rogers’ Motion to Dismiss Sayers’
9 Counterclaims (Dkt. No. 30) is hereby extended to Tuesday, January 21, 2020.
- 10 3. Sayers’ request was made in good faith. Sayers’ counsel requested that Sayers and Rogers
11 agree to this proposed joint stipulation in light of Sayers’ counsel’s travel schedule the
12 weeks of December 23, 2019, and December 30, 2019. Rogers’ counsel agreed to an
13 extension of Sayers’ deadline to respond to Rogers’ Motion to Dismiss Sayers’
14 Counterclaims from January 6, 2020, to January 21, 2020.

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1 The Stipulating Parties respectfully submit the foregoing and request that the Court enter the
2 Order included below.

3 Respectfully submitted this 31st day of December 2019.

4 **COZEN O'CONNOR**

5 By: /s/ Amy B. Alderfer

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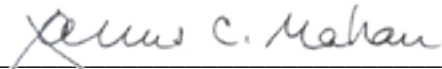
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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 6, 2020